

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

UNIVERSITAS EDUCATION, LLC,

Petitioner/Judgment Creditor,

v.

Case No. 14-FJ-5-HE

NOVA GROUP, INC.,

and

AVON CAPITAL, LLC, a Connecticut  
limited liability company,

Respondents/Judgment Debtors.

**MOTION TO WITHDRAW AS COUNSEL**

Pursuant to LCvR83.5 and 5 O.S. Ch. 1. App. 3-A, Rule 1.16(b)(1), attorney Angela Probasco, one of the attorneys who is counsel of record for Defendant Avon Capital, LLC, a Wyoming limited liability company (“Avon Capital-WY”), hereby moves the Court for an order granting her leave to withdraw as counsel. In support of this motion, Ms. Probasco states as follows:

1. Pursuant to 5 O.S. Rule 1.16(b)(1), a lawyer may withdraw from representing a client if withdrawal can be accomplished without material adverse effect on the interests of the client.

2. Ms. Probasco has accepted a position with another firm and will no longer be an attorney with Lewis Brisbois Bisgaard & Smith LLP.

3. Attorneys Alan L. Rupe of Lewis Brisbois Bisgaard & Smith LLP and Gerald P. Green of Pierce Couch Hendrickson Baysinger & Green have entered their appearances on behalf of Avon Capital-WY, have been actively participating in this case, and will continue to represent Avon Capital-WY. Accordingly, Avon Capital-WY will not be prejudiced by Ms. Probasco's withdrawal.

4. In accordance with LCvR83.5, Avon Capital-WY has been given notice of Ms. Probasco's withdrawal and has no objection.

**Relief Requested**

WHEREFORE, undersigned counsel Angela Probasco respectfully requests the Court enter an order granting her leave to withdraw as counsel of record for Avon Capital-WY.

Dated this 18th day of October, 2017.

Respectfully submitted,

By: **s/ Angela Probasco**

Angela Probasco, *pro hac vice*  
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*Attorney for Intervenor Avon Capital, LLC, a  
Wyoming limited liability company*

### **CERTIFICATE OF SERVICE**

I hereby certify that on October 18, 2017 I electronically transmitted the attached document to the Court Clerk using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to all ECF registrants:

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**s/ Angela Probasco**  
Angela Probasco